REMARKS

In the Final Office Action[1], the Examiner objected to the specification; rejected claims 7-12 under 35 U.S.C. § 101; rejected claims 1-3, 7-9, and 13-15 under 35 U.S.C. § 102(b) as being anticipated by "Windows XP in a Nutshell" by Karp et al. ("*Karp*"); and rejected claims 4-6 and 10-12 under 35 U.S.C. § 102(b) as being anticipated by "Microsoft Excel 2002 Version 3.0.6926 SP-3" ("*Excel*").

Applicants have amended claims 1-4, 7-12, and 13-15. Claims 1-15 remain pending.

I. Regarding the objection to the specification

The Examiner objected to the specification as failing to provide proper antecedent basis because "[t]here is a mention of 'machine readable storage,' but the term 'computer-readable storage medium' is not found in the specification." (Office Action at page 2). Applicants have amended the specification to conform terminology between the claims and the specification, and to clarify that the claims do not cover a propagated signal. No new matter has been added. Therefore, Applicants respectfully request that the Examiner withdraw the objection to the specification.

II. Regarding the rejection of claims 7-12 under 35 U.S.C. § 101

Applicants respectfully traverse the rejection of claims 7-12 under 35 U.S.C. § 101, as directed to non-statutory subject matter.

[1] The Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

Independent claims 7 and 10 are drawn to a "computer program product tangibly embodied in a computer-readable storage medium." Thus claims 7 and 10 positively recite a computer program product that is tangibly embodied in a computer-readable storage medium. Applicants note that "a claimed computer-readable medium encoded with a computer program is a computer element which defines structural and functional interrelationships between the computer program and the rest of the computer which permit the computer program's functionality to be realized, and is thus statutory." MPEP § 2106(IV)(B)(1)(a). Applicants also note that "computer programs embodied in a tangible medium, such as floppy diskettes, are patentable subject matter under 35 U.S.C. § 101 and must be examined under 35 U.S.C. §§ 102 and 103." In re Beauregard, 53 F.3d 1583 (Fed. Cir. 1995). Therefore, claims 7-12 fall squarely within the categories of patentable subject matter, and Applicants submit that the rejection of claims 7-12 should be withdrawn.

III. Regarding the rejection of claims 1-3, 7-9, and 13-15 under 35 U.S.C. § 102(b) as being anticipated by *Karp*

Applicants respectfully traverse the rejection of claims 1-3, 7-9, and 13-15 under 35 U.S.C. § 102(b) as anticipated by *Karp*. In order to properly establish that *Karp* anticipates Applicants' claimed invention under 35 U.S.C. § 102, each and every element of each of the claims in issue must be found, either expressly described or under principles of inherency, in that single reference. Furthermore, "[t]he identical invention must be shown in as complete detail as is contained in the ... claim." *See* M.P.E.P. § 2131, quoting *Richardson v. Suzuki Motor Co.*, 868 F.2d 1126, 1236, 9

U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989). *Karp* does not anticipate the claims at least because it fails to teach each and every element of the claims.

Claim 1 recites a method including, for example:

> detecting a user navigation input of a sibling navigation input, which includes a first group identifier key press, or a parent navigation input, which includes a second group identifier key press, and if the navigation input is the sibling navigation input, shifting input focus to a next sibling group in the hierarchy, and if the navigation key is the parent navigation input, shifting input focus to a parent group in the hierarchy.

(emphasis added). *Karp* does not disclose at least these elements of claim 1.

Karp discloses an appendix list of keyboard shortcuts. The Examiner asserts that Fig. 2 illustrates "the first group of control elements as indicated by under scoring letters of controls (file, edit, insert, format, tools, window, help) therefore the ALT key is correlated with a group identifier to relate to the group of controls. The ALT key being that of the parent navigation control where ALT is combined with a letter (X) that corresponds to a control UI element." (Office Action at page 4). Even assuming the user input shown in Figure 2 could constitute "a parent navigation input, which includes a second group identifier key press," which Applicants do not concede, *Karp* fails to teach "a sibling navigation input, which includes a first group identifier key press," as recited in claim 1. Any sibling navigation key that may exist in Fig. 2 of *Karp* constitutes a keystroke, such as the left or right arrow key, to navigate the applications running on the operating system. Such keys do not constitute "a first group identifier key press." The Examiner seems to assert that an arrow key on the keyboard constitutes a sibling navigation input, which inherits a group identifier from the control menu being navigated. (Office Action at pages 8-9). However, claim 1 requires that the sibling navigation input

include "a first group identifier key press." Because a physical group identifier key press is not taught by *Karp* as part of any sibling navigation input, *Karp* does not disclose "a sibling navigation input, which includes a first group identifier key press," as recited in claim 1.

Furthermore, Fig. 3 states that the user "can use the tab control to tab through the child nodes of a parent or the user can use the left and right arrow keys to tab through parent nodes and up and down arrow keys to tab through child nodes." The keys used to navigate the child nodes, being either the tab key or the up/down arrow keys, do not include a group identifier key press.

The Examiner seems to assert that sibling navigation inputs inherit a group identifier from their parent group: "[t]hus therefore when the user activates a parent control to display sibling control group the group identification is evident or else a random menu or crossed menus (file control is activated and tools sibling group is displayed) would be displayed." (Office Action at page 5). However, any child navigation inputs that may exist in the prior art do not include "a first group identifier key press." Therefore, *Karp* does not teach or suggest the claimed "detecting a user navigation input of a sibling navigation input, which includes a first group identifier key press and a parent navigation input, which includes a second group identifier key press," as recited in claim 1.

Karp fails to teach at least the above elements and, accordingly, *Karp* cannot anticipate claim 1. Thus, claim 1 is allowable for at least these reasons. Claims 2 and 3 are also allowable at least due to their dependence from claim 1.

Independent claims 7 and 13, while of different scope from claim 1 and each other, recite elements similar to those of claim 1 and, thus, are allowable over *Karp* for at least the same reasons discussed above in regard to claim 1. Claims 8-9 and 14-15 are also allowable at least due to their dependence from claims 7 and 13, respectively.

IV. Regarding the rejection of claims 4-6 and 10-12 under 35 U.S.C. § 102(b) as being anticipated by *Excel*

Applicants respectfully traverse the rejection of claims 4-6 and 10-12 under 35 U.S.C. § 102(b) as anticipated by *Excel*.

Claim 4 recites a method including, for example:

> detecting a user navigation input of a forward navigation input, which includes a first group identifier key press or a backward navigation input, which includes a second group identifier key press;
> if the user navigation input is the forward navigation input, shifting input focus to a next editable cell of the table; and
> if the user navigation input is the backward navigation input, shifting input focus to a previous editable cell of the table.

(emphasis added). *Excel* does not disclose at least these elements of claim 4.

Excel discloses a parent node and child nodes associated with the parent node (Fig. 2). The user may arrow into editable cells, forward and backward navigate through the cells (Fig. 3), and lock a cell (Fig. 4). The Examiner asserts that Fig. 2 illustrates "the first group of control elements as indicated by under scoring letters of controls (file, edit, insert, format, tools, window, help) therefore the ALT key is correlated with a group identifier to relate to the group of controls. The ALT key being that of the parent navigation control where ALT is combined with a letter (X) that corresponds to a control UI element." (Office Action at page 6). However, any forward or backward user navigation input that may exist in Fig. 2 constitutes a keystroke, such as the left or right

arrow key, to navigate the parent or child nodes. Such keys do not constitute "a first group identifier key press."

Furthermore, the user navigation inputs illustrated in Fig. 3 of *Excel* are the arrow keys, the Tab key, or the Shift-Tab key combination. These inputs are used to navigate through cells, but they do not include a "group identifier key press." Therefore, *Excel* does not teach or suggest the claimed "detecting a navigation key press of a forward navigation key having a first group identifier or a backward navigation key having a second group identifier," as recited in claim 4.

Excel fails to teach at least the above elements and, accordingly, *Excel* cannot anticipate claim 4. Thus, claim 4 is allowable for at least these reasons. Claims 5 and 6 are also allowable at least due to their depending from claim 4.

Independent claim 10, while of different scope, recites limitations similar to those of claim 4 and, thus, is allowable over *Excel* for at least the same reasons discussed above in regard to claim 4. Claims 11 and 12 are also allowable at least due to their depending from claim 10.

V. Conclusion

In view of the foregoing remarks, Applicants respectfully request reconsideration of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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